

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: Draft – March 31, 2020

Region: Washington Regional Office
County: Beaufort
NC Facility ID: 0700151
Inspector's Name: Yongcheng Chen
Date of Last Inspection: 06/18/2019
Compliance Code: 3 / Compliance - inspection

<p align="center">Facility Data</p> <p>Applicant (Facility's Name): Iconic Marine Group, LLC</p> <p>Facility Address: Iconic Marine Group, LLC 1653 Whichards Beach Road Washington, NC 27889</p> <p>SIC: 3732 / Boat Building And Repairing NAICS: 336612 / Boat Building</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p align="center">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0512, 02D .0515, 02D .0521 & 02D .1806 NSPS: N/A NESHAP: 15A NCAC 02D .1111 (40 CFR Part 63, Subpart VVVV) PSD: N/A PSD Avoidance: 15A NCAC 02Q .0317 for 02D .0530 VOC emissions NC Toxics: 15A NCAC 02D .1100 & 02Q .0711 112(r): N/A Other: N/A</p>																												
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<p>Review Engineer: Judy Lee</p> <p>Review Engineer's Signature: _____ Date: _____</p>					<p align="center">Comments / Recommendations:</p> <p>Issue: 10534/T02 Permit Issue Date: XXXX Permit Expiration Date: June 30, 2025 [This date will change to 5 years upon issuance of the 1st Time Title V permit]</p>																										

1. Purpose of Application

Iconic Marine Group, LLC (Iconic Marine) currently operates a facility in Beaufort County, North Carolina, under state permit 10534R01. The purpose of this application is to convert the existing permit into a 1st Time Title V permit. The existing permit is set to expire on June 30, 2025.

In 2017, Iconic Marine Group, LLC (Iconic Marine) leased, owned and operated some of the emission units at the adjacent Fountain Powerboats, Inc. facility. Application No. 0700151.17A was submitted to separate some of the sources at the Fountain facility in Buildings 3 (**ID No. ES-3**), 4 (**ID No. ES-4**), 5 (**ID No. ES-5**), 10 (**ID No. ES-10**), 16 (**ID No. ES-16**), 17 (**ID No. ES-17**), and 19 (**ID No. ES-19**) and place them into a Title V permit for Iconic Marine. These sources were included in permit No. 10534R00.

Application 0700151.19A was submitted to consolidate the remaining sources left under existing Title V Air Permit (06175T12) for Fountain Powerboat facility into Iconic Marine's Title V Air Permit which was issued as Title V Permit No. 10534R01. The permit for Fountain Powerboat, Incorporated was requested to be rescinded in July 2019 because the facility has ceased operation.

Iconic Marine initially submitted a 1st Time Title V Air Permit application which was received by the Washington Regional Office (WARO) on December 22, 2017 and subsequently received by the Raleigh Central Office (RCO) on January 2, 2018. This application submittal satisfied the requirements of issued permit No. 10534R00 to file a Title V Air Quality Permit pursuant to 15A NCAC 02Q .0504 (file application one year from the operation of the new facility).

The facility then submitted a permit modification to consolidate additional emission sources on February 18, 2019. Application No. 0700151.19A for this modification was processed and issued on September 13, 2019 (10534R01) with a requirement for the facility to submit an amended 1st Time Title V Air Quality permit application per specific condition 2.2.A.8. in accordance with 02Q .0504 to include the additional sources.

The application for a 1st Time Title V Permit was amended on February 27, 2020 to include the additional sources added to Iconic Marine's permit as a result of the facility assuming control of all of the remaining sources left under the Fountain Powerboats, Incorporated permit into Iconic Marine's Title V Air Permit No. 10534R00 (issued on July 19, 2017). This application amendment satisfies the requirements of permit No. 10534R01.

2. Facility Description

Excerpt from most recent inspection report dated June 18, 2019 under Iconic Marine:

Iconic Marine Group, LLC manufactures fiberglass boats in open molds. The finished boats are 20-48 feet in length encompassing four (4) brands; Baja, Fountain (Pro-Line), Donzi, Advance Performance Marine. Normal operating hours are: 8-10 hours per day and 4 or 5 days per week. They are currently producing about 3-4 boats each week with 200 employees.

The process consists of fiberglass resin lamination and gelcoat application; and associated assembly and finishing operations.

Excerpt from amended 1st Time Title V Application received February 27, 2020:

Primary raw materials (gel coat, fiberglass, polyester resin and wood) are brought to the facility and through various steps (molding, laminating, assembly, and painting) these components are combined to manufacture a fishing or powerboat.

In the lamination area, a gel coat substrate is used to form the beginning of a boat hull, deck or small part. Once the gel coat is made into a mold, glass fibers are laminated with a polyester resin using hand lay-up and spray lay-up procedures to produce the desired fiberglass part. The fiberglass parts are then laminated with boat superstructures to provide structural support. Other components such as engines, wiring, plumbing, water tanks, fuel tanks, woodworking, etc. are integrated into boat construction. From assembly, the boat goes to the graphics booths where various decorative enhancements are applied. Miscellaneous touch-up and clean-up procedures are completed, followed by the boat being tested before final delivery.

➤ **Facility name/address/legal name/responsible official check:**

Facility Name:

- ✓ **IBEAM has Iconic Marine Group, LLC**
- ✓ NC Department of the Secretary of State Corporation search: <https://www.sosnc.gov/>
Legal Name - Iconic Marine Group, LLC
Prev Legal Name - CUSTOM MARINE GROUP LLC

✓ **APPLICATION Site Name:**

Legal Corporate/Owner Name is Iconic Marine Group, LLC

Responsible Official:

- ✓ **IBEAM** previously listed Tom Klontz, Treasurer as the Responsible Official (RO)
- ✓ **APPLICATION** lists Mr. Jeff Harris, Chief Operating Officer.
A review of IBEAM Facilities information and documents indicates the RO was changed to Mr. Jeff Harris, Chief Operating Officer, PO Drawer 457, Washington, NC 27889 for the Facility, Authorized and Technical Contacts. An official request was received by WARO on January 27, 2020 for the RO change.

3. Application Chronology/History

Please see the attached Comprehensive Application Report for 0700151.18A and email correspondence for more details.

Date	Action Item
May 6, 2016	Iconic Marine Group, LLC was formed per the Department of Secretary of State (SOS) website https://www.sosnc.gov/search/index/corp
May 13, 2016	Renewal issued to Fountain Powerboats, Inc. 06175T12 by Ms. Jenny Sheppard of RCO
July 14, 2016	Facility inspection report for Fountain issued by Mr. Steven Daniels of the WARO. Facility was found to be in compliance.

Date	Action Item
February 24, 2017	A 502(b)(10) notification of upcoming change was received for the removal of sources from Fountain's permit
February 28, 2017	A 502(b)(10) notification acknowledgment was issued to Fountain for the removal of emissions sources from Fountain's permit
April 7, 2017	Permit application 0700122.17A was received from Iconic Marine for a state 02Q .300 permit modification to transfer sources from Fountain's permit to Iconic Marine's new permit
July 19, 2017	Permit No. 10534R00 issued to Iconic Marine Group, LLC
December 22, 2017	Iconic Marine submitted 1st Time TV permit application (No. 0700151.18A) received in RCO on January 2, 2018 to satisfy the requirement to file a Title V Air Quality Permit Application pursuant to 15A NCAC 02Q .0504 contained in the cover letter to issued Permit No. 10534R00
February 18, 2019	Iconic Marine submitted State permit application (No. 0700151.19A) for addition of the remainder of Fountain sources
March 26, 2019	Additional technical information request sent to Iconic Marine
May 23, 2019	Modeling submitted for Iconic Marine
June 18, 2019	Facility inspection performed by Mr. Yongcheng Chen, WARO. Annual air permit inspection with the assistance of Tom Klontz
June 21, 2019	Site visit to Iconic Marine by RCO staff (Tom Anderson, Judy Lee and Mark Yoder)
July 2, 2019	DAQ WARO rescinded Fountain's permit per letter on file in IBEAM
July 17, 2019	Modeling Memorandum for styrene emissions completed by Mr. Mark Yoder, AQAB
August 18, 2019	Email response to additional information request (i.e., updated Forms, emissions information & calculations, etc.) received
August 19, 2019	Draft permit sent to Iconic Marine, Mr. Klontz; WARO, Mr. Yongcheng and Stationary Source Compliance Branch (SSCB), Mr. Samir Parekh for comments
August 20, 2019	Comments received from WARO and SSCB
September 13, 2019	Permit No. 10534R01 issued to Iconic Marine Group, LLC with requirement to amend Title V application (No. 0700151.18A)
January 21, 2020	Sent draft to first line supervisor
February 27, 2020	1 st Time Title V Application amendment received
March 5, 2020	Email to facility requesting clarifications
March 23, 2020	Email response from facility's consultant through Mr. Harris, RO. This completes the application 1 st Time Title V application submittal.
March 23, 2020	Draft 1 st Time Title V permit sent to Iconic Marine, WARO and SSCB for comments prior to notice and EPA review
March 25, 2020	Comments received from SSCB
March 26, 2020	Comments received from WARO
March 30 & 31, 2020	Comments received from Iconic Marine
XXXX, 2020	Public notice and EPA review period

4. Permit Modifications/Changes and Title V Equipment Editor (TVEE) Discussion

The following table describes the modifications to Iconic Marine's current permit 10534R01 as part of this 1st Time Title V modification:

Page No(s).	Section	Description of Changes
1 – 29	Entire permit, where applicable	Modified to reflect current permit number, issued and effective dates and associated application information Revised “300” format to Title V permit format per current guidance Replaced 02Q .0308(a) with 02Q .0508(f) Added noncompliance statements
Attachment	List of Insignificant Activities	Updated descriptions to match application amendment.
Attachment	Table of Changes	Modified to reflect changes for this permit modification
3	Section 1	Updated page numbers on equipment table Modified emission source IDs and descriptions to match application amendment
4 – 8	Sections 2.1.A. through 2.1.B.	Combined all like sources under Fiberglass Boat Manufacturing (to be consistent with other permits for Fiberglass facilities in NC) and subject to the same State regulations to make the facility’s permit less repetitive Modified emission source IDs and descriptions to match application amendment
8 – 21 (removed)		Removed Sections 2.1.C through 2.1.I due to consolidating into condition 2.1.A.
4 – 18	Sections 2.1 and 2.2	Revised regulations per current Title V shell guidance and MRRR consistency across Fiberglass Boat Manufacturing facilities
10 – 11	Section 2.2 – A.3	Revised 15A 02D .1100 condition to included latest regulatory language provided via email on September 24, 2019
24 – 25 (previous permit)	Section 2.2 – A.6 through A.9	Removed 15A NCAC 02Q .0207, 02Q .0304, 02D .0535 and 02D .0540 requirements per Title V permitting guidance Removed 15A NCAC 02 .0504 – satisfied on January 2, 2018 and February 27, 2020 (Application No. 0700151.18A)
11 – 18	Section 2.2 – B.	Revised MACT Subpart VVVV per latest guidance and to be consistent with other Fiberglass Boat Manufacturing facilities in NC. Additional changes made were reference citations, clarifications/corrections inadvertently missed during processing of previous permits and Title V noncompliance statements added.
19 – 29	Section 3 – General Conditions	Replaced “300” General and Specific Conditions with latest Title V General Conditions (version 5.3, 08/21/2018)

No modifications to Title V Equipment Editor (TVEE) were required as a result of this permit modification. No new equipment or change in emission sources since issuance of 10534R01.

TVEE was approved on XXXX. See Permit Modification Tracking slip for confirmation.

5. Regulatory Review

Iconic Marine is currently subject to the following regulations, in addition to the requirements in the General Conditions:

15A NCAC 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”
15A NCAC 02D .0515 “Particulates from Miscellaneous Industrial Processes”
15A NCAC 02D .0521 “Control of Visible Emissions”
15A NCAC 02D .0535 “Excess Emissions Reporting and Malfunction” (Removed, included in Title V General Conditions)
15A NCAC 02D .0540 “Particulates from Fugitive Dust Emission Sources” (Removed, included in Title V General Conditions)
15A NCAC 02D .1100 “Toxic Air Pollutants Emissions Limitation Requirement”
15A NCAC 02D .1111 – 40 CFR 63, Subpart VVVV “National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing”
15A NCAC 02D .1806 “Control and Prohibition of Odorous Emissions”
15A NCAC 02Q .0711 “Toxic Air Pollutants Emissions Limitation Requirement”
15A NCAC 02Q .0317 “Avoidance Conditions for 02D .0530 Prevention of Significant Deterioration”
15A NCAC 02Q .0207 “Annual Emissions Reporting” (Removed)
15A NCAC 02Q .0304 “Renewal Application” (Removed)
15A NCAC 02Q .0504 “Option for Obtaining Construction and Operation Permit” (Removed)

A regulatory review for all the requirements listed above will not be included in this document. The facilities (previously Fountain Power Boats and Iconic Marine) have shown a history of complying with these existing regulations. Continued compliance is indicated.

Iconic Marine’s permit conditions were consolidated where appropriate. All like emission sources subject to the same regulations (both State and Federal) under Fiberglass Boat Manufacturing where combined to make the permit less repetitive.

Only the rules affected (or excluded) by this permit application request will be discussed in detail below:

- 02D .0512 “Particulates from Miscellaneous Wood Products Finishing Plants”
This rule applies to sources that emit particulates from wood working, sanding, or finishing and requires at a minimum for its collection, adequate duct work and properly designed collectors. The boat manufacturing operations (ID No. ES-04) consist of cutting of stringers, bulk heads, foam cutting and gluing foam to plywood parts, which are subject to this regulation.

Particulate matter emissions are controlled by a dry filter system. Monthly visual inspections of the filter pads are required, and the results recorded. Records must be reported twice per year. Continued compliance will be determined with subsequent inspections and reports.

The only changes made to Iconic Marine's permit under this regulation were reference citations, Title V noncompliance statements and shell language changes per latest Title V guidance.

➤ 02D .0515 "Particulates from Miscellaneous Industrial Processes"

This rule applies to sources that emit particulates and are not subject to a different specific particulate emission limit. The boat manufacturing operations (ID Nos. ES-03, ES-05, ES-10, ES-11, ES-15, ES-16, ES-17 and ES-19) are subject to this rule.

The rule limits particulate emissions based on the process rate of the specific sources. The sources are controlled by a dry filter system. Records must be reported twice per year. Continued compliance will be determined with subsequent inspections and reports.

The only changes made to Iconic Marine's permit under this regulation were reference citations, Title V noncompliance statements and shell language changes per latest Title V guidance.

➤ 02D .0521 "Control of Visible Emissions"

This rule applies to sources with visible emissions ("VE") that are not subject to a different VE standard under NSPS or NESHAP regulations.

Each source at this facility was manufactured after July 1, 1971; thus, limited to 20% opacity. The facility must perform regular observations to ensure that VE opacity does not exceed this limit and keep records of those observations. Records must be reported twice per year. Continued compliance will be determined with subsequent inspections and reports.

The only changes made to Iconic Marine's permit under this regulation were reference citations, Title V noncompliance statements and shell language changes per latest Title V guidance.

➤ 02D .1111 "Maximum Achievable Control Technology" (MACT)

This rule incorporates into NC's SIP each of the Federal rules found under 40 CFR Part 63. For this facility, the only MACT rule that applies is Subpart VVVV. For the purposes of applicability under 40 CFR Part 63, this facility is a Major Source of Hazardous Air Pollutants ("HAP").

40 CFR Part 63, Subpart VVVV: "Boat Manufacturing"

This rule applies to facilities that manufacture fiberglass or aluminum recreational boats and are also Major Sources of HAP. Iconic manufactures fiberglass boats and is a Major Source, so this rule applies.

The rule limits HAP emissions from different parts of the boat building process. The rule has several different compliance options; in general, Iconic Marine complies with the emission limits using the "compliant materials" option. The facility must calculate HAP content and HAP emissions using the equations provided in the rule and compare them to the limits listed

in the rule. The facility must keep records of material usage and calculations to demonstrate compliance with the rule. The facility must submit reports of recordkeeping twice per year.

The only changes made to Iconic Marine's permit under this regulation were reference citations, clarifications/corrections inadvertently missed during processing of previous permit applications and Title V noncompliance statements added.

Iconic Marine was determined to be in compliance with this rule during the most recent inspection of the facility. Continued compliance will be determined with subsequent inspections and reports.

➤ 02Q .0317 "Avoidance Conditions"

This rule allows facilities to accept Federally-enforceable limits in the Title V permit in order to avoid triggering requirements of certain rules. Iconic Marine has accepted a facility-wide limit on Volatile Organic Compounds (VOC) emissions in order to avoid applicability of 02D .0530 "Prevention of Significant Deterioration" (PSD). The limit is 250 tons per year. As long as Iconic Marine continues to comply with this limit, the facility will be a Minor Source for PSD, and thus not subject to 02D .0530. This limit was included in the permit under Fountain Powerboats prior to Iconic Marine purchasing and consolidating emission sources.

In order to demonstrate compliance with the limit, Iconic Marine calculates facility-wide VOC emissions monthly using appropriate emission factors (EF) in accordance with AP-42 Section 4.4 (updated 5/08), emissions calculations using ANSI/ACMA/ICPA UEF-1-2004 Estimating Emission Factors from Open Molding Composite Processes which utilize the Unified Emission Factors (UEF) for open molding of composites dated October 5, 2011.

Due to the number of materials used, Iconic Marine's permit will not include a table listing out each material, EF and pollutant associated with each process as other permitted fiberglass boat manufacturing permits do. Records must be reported twice per year. It has been updated with language that reflects similar facilities and current guidance with the exception of the above referenced table.

Based on a historical review of facility records, the highest actual VOC emissions occurred during the 1999 emissions inventory (EI) year (60.48 tpy VOC) while operating under Fountain Powerboat's control. Continued compliance is expected.

The only changes made to Iconic Marine's permit under this regulation were reference citations, Title V noncompliance statements and shell language changes per latest Title V guidance.

The facility was determined to be in compliance with this rule during the most recent inspection of the facility. Continued compliance will be determined with subsequent inspections and reports.

- 02D .1100 "Control of Toxic Air Pollutants" and 02Q .0711 "Emission Rates Requiring a Permit"

This facility previously performed air dispersion modeling for toxic air pollutants (TAPs) in order to demonstrate compliance with the acceptable ambient limits (AALs) listed in 02D .1104 for styrene as part of the permit application for recently issued permit No. 10534R01.

The only changes to this condition were updated language per current Title V guidance.

The following regulations were removed during processing of this 1st Time Title V application due to the facility no longer holding a State Only "R" permit:

- 15A NCAC 02D .0535 "Excess Emissions Reporting and Malfunction"
- 15A NCAC 02Q .0207 "Annual Emissions Reporting"
- 15A NCAC 02Q .0304 "Renewal Application"
- 15A NCAC 02Q .0504 "Option for Obtaining Construction and Operation Permit"
- 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources"

These rules were replaced with Title V equivalent rules or included under the Title V permit General Conditions per current guidance.

6. NSPS/PSD/NAA/Increment/MACT/CAM/Facility Wide Toxic Air Pollutants

NSPS – The facility is not currently subject to a New Source Performance Standard (NSPS). This permit modification does not affect this status.

NESHAPS/MACT – The facility is currently subject to Maximum Achievable Control Technology (MACT) Standards, 15A NCAC 02D .1111 – 40 CFR 63, Subpart VVVV "National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing." This permit modification does not affect this status.

PSD/Increment – This facility is classified as a minor source under Prevention of Significant Deterioration (PSD). The facility is currently subject to a less than 250 tons per year (tpy) PSD Avoidance Condition for VOC emissions.

Beaufort County is attainment for criteria pollutants. Beaufort County has been triggered for PSD increment tracking for PM₁₀, SO₂ and NO_x. However, this permit modification does not consume or expand increments for any pollutants.

112(r) – This facility is not subject to the requirements of the 112(r) "Prevention of Accidental Releases" program.

CAM – 15A NCAC 02D .0614 [40 CFR Part 64] COMPLIANCE ASSURANCE MONITORING (CAM) - 40 CFR 64 requires that a continuous compliance assurance monitoring (CAM) plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard.

This facility does not use a control device to meet an applicable standard (only a dry filter system for control of particulate emissions that is inherent to the process); thus, this facility is not subject to CAM.

7. Facility Wide Air Toxics Pollutants

The facility was previously required to provide a facility-wide toxics compliance demonstration in 2005 while operating under Fountain. Revised modeling was submitted by Mr. Paul Zawila of Value Environmental, Iconic Marine's consultant, via email on May 23, 2019 for review. Per Memorandum dated July 17, 2019 from Mr. Mark Yoder, AQAB, the modeling adequately demonstrates compliance on a facility-wide basis for styrene (Refer to review for issued permit No. 10534R01 for more details).

8. Facility Emissions Review

This permit modification is not expected to change potential emissions from the facility. For a historical review of actual emissions from the facility, see the summary table on the first page of this review or Fountain Powerboat's emissions history for more data.

9. Compliance History

Compliance history (5-years) – There have been no compliance issues.

Per latest inspection report – WARO Comments, Conclusions and Recommendations:

The facility appeared to operate in compliance with all applicable air quality regulations and permit conditions at the time of inspection. The facility was last inspected on June 18, 2019 by Mr. Yongcheng Chen of the WARO and found to be in compliance at the time of the inspection.

Based on Iconic Marine and Fountain Powerboat facilities most recent compliance inspections, both facilities were in compliance with applicable Air Quality regulations.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

The Public Notice and EPA Review periods began on XXXX, 2020. The Public Notice period ended on XXXX, 2020 and the EPA Review period ended on XXXX, 2020.

XXXX comments were received.

11. Conclusions, Comments, and Recommendations

Professional Engineering Seal

A Professional Engineering Seal (PE Seal) is not required for this permit modification pursuant to 15A NCAC 2Q .0112 “Application Requiring A Professional Engineering Seal.” A PE Seal is required to seal technical portions of air permit applications for new sources and modifications of existing sources as defined in Rule .0103 of this Section that involve:

- (1) design;
- (2) determination of applicability and appropriateness;
- (3) or determination and interpretation of performance; of air pollution capture and control systems.

A professional engineer’s seal (PE Seal) was not required for this permit modification because the facility only uses a dry filter system for control of particulate emissions that is inherent to the process.

Zoning Consistency Determination

A consistency determination was not required for this permit modification pursuant to 15A NCAC 2Q .0507(d) due to addition of the proposed sources. A zoning consistency determination is required if the modification is considered an expansion. However, since all the sources in this application are now being recombined under one permit after being split between Fountain and Iconic Marine, the Division does not consider this an expansion.

WARO recommends issuance of the permit and was presented with a DRAFT permit prior to issuance.

RCO concurs with WARO’s recommendation to issue Title V Air Quality Permit No. **10534T02**.